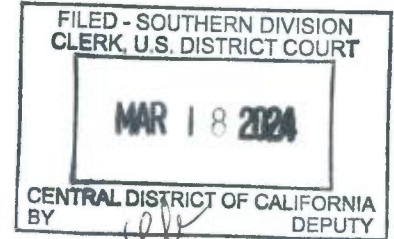


Full Nam: ANGEL WANG
Email: AngelWang777@yahoo.com
Mailing Address: PO Box 1583
Placentia CA 92871
Phone Number: 949-922-4999



**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

Angel Wang

Plaintiff,

Vs.

Caping World Hold, Inc.

Thor Motor Coach Corp.

Defendant.

Case No: 8:24-cv-00572-CJC-DFMx

Complain For

1. Fraud & Deception
2. Misrepresentation
3. Breach of Fiduciary duty
4. Breach of Contract
5. Products Liability
6. Elder Abuse
7. Intentional Infliction of Emotion Distress
8. Trespass to Chattel
9. Financial Damaged
10. Negligence

I. Jurisdiction

1. I sued the both companies are out of state of California and in different States.

II. Venue

2. I am a resident in Orange County of California. So I filed this lawsuit belong to the Central District Court.

III. Parties

1 3. Plaintiff's Name: Angel Wang with a homeless. Cell Phone number: 949-922-4999.

2 Mailing Address: PO Box 1583, Placentia CA 92871.

3 I am living this RV with resident at Orange City.

4 4. Defendant; Camping World Holdings, Inc. Address: 2 Marriott Dr, Lincolnshire, IL 60069.

5 Phone Number: 1-866-873-5550

6 5. Defendant; Thor Motor Coach Corp. Address; 701 County Road15, Elkhart, IN 46516.

7 Headquarters Office Phone Number: 1-800-860-5658.

8 Website; www.thormotorcoach.com

9
10 IV. Statement of the Facts

11 1. I purchased a RV by fraud from the sale manage, accounting, two sales man and others
12 in Fresno Camping World (FCW) on March 16, 2022. This RV Model is Coleman with 23ft, Class
13 C with Ford E350 fromThor Motor Coach of Manufactory. I purchased the price was
\$91,000.00 for it with 20 years loan that it is \$743,76 /month for this RV's payment.

14 2. This was the first time I purchased a RV and never drive it before, also I did not even
15 drive a truck until now. For the most important reason for I wanted to purchase a RV that I want
16 to save my time during traffic, any time I need to work on my lawsuit with write something and
take break time any time that I need it.

17 3. After I have made my final decision to buy a RV that I had to give up my room in
18 Orange County because my financial situation wouldn't allow me to keep a room with a RV.
19 Also I wanted to drive a RV for traveling from Orange County to Monterey County in each
20 month for manage my brother's house in Marina of Monterey County, because my brother is
living in China, not this Country.

21 4. Then I went to a RV Dealer that is Kirby's Barber RV in Ventura on 02/26/ 2022, when I
22 was on the way from Orange County to Monterey County. It was the first time that I have
23 walked in the RV Dealer. I saw a class C RV that similar with I have purchased this RV that I
24 liked it. But it didn't buy, because I was my first time walk in RV Dealer to look for RVs in my life
and I didn't know nothing about RV. So I got some informations that RV RVs and left. But this
25 dealer gave me the price to trade my SUV in for 20,000.00.

26 5. When I got in Marina that I was beginning searching the RVs with Class C from
27 Google. Then I found the Coleman with 23ft, Class C with Ford E350 and look like I saw the
28 one in Kirby's Barber RV at Fresno Comparing World Dealer and Roseville Comparing World
Dealer, so I filed out a form for both Dealer and left my contacts informations for getting
informations of the RVs in online. After that the sales always called me with both dealer and

1 special the Fresno Comparing World Dealer that they let me to go their campsite to take look
 2 the RVs. I like one that was I bought the one with sales manage in Roseville Camping World.
 3 But, I only looked from online and I never drive a RV and even I never drove a truck before I
 4 purchased this Class C RV.

5 6. But I have contacted with sale manage in Roseville Comparing World Dealer in the first
 6 on the phone that I have tried to buy the RV with same the RV Model with 23ft, Class C
 7 Coleman and Ford E350 from Manufactory of Thor Motor Coach from that dealer. He told me
 8 that he will teach me how to drive this RV and they need for 4-5 day to ready this RV for me.
 9 But I didn't have a chance to this dealer yet, because the sale manage has considered my
 10 income.

11 7. Then, I was on the way to that dealer and I stop by the Fresno Camping World Dealer
 12 and purchased this RV from there. When I went to this dealer that I didn't want to buy this RV
 13 at all. I just want to look the RVs in there and going to Roseville.

14 8. This kind Class C RV is very difficult for me to drive. If the sales man let me to drive for
 15 test this RV or he told me about the truth driving about this RV before I purchased that I would
 16 not buy this kind RV at all. I would rather to buy a class B one. Because this Class C RV is very
 17 difficult to drive that I could not handle it from my health situation.

18 9. After I looked these RVs in Fresno, then I want to leave for Roseville Camping World.
 19 Then the sales manage stop me and talk to me. I asked him about whether does it need a
 20 special license to drive this kind RV? is it difficult to drive? Do I need to get training for driving
 21 this kind RV? Then he lied to me about this RV is not difficult to drive and it just like drive my
 22 SUV, it does not need a special license to drive it. I was so stupid to truth him.

23 10. He told me that they need 4-5 day to ready this RV for me. Then I tried to leave and
 24 said to him that I want to think about it. He asked me when I would back there, then I told him
 25 that I would come back to Fresno end of the March, 2022.

26 11. The CarMax gave my SVU value was too low about \$16.000 that I would not trade my
 27 car with so low price. Before the Dealer wanted to buy my car back with \$23.000 in Sunnyvale
 28 Ford and I didn't. I was not that I have to trade my SUV with buy a RV because I could sale my
 SUV back to Sunnyvale Ford Dealer. Then I was going to buy a new RV. That was why I told
 the manage that was impossible that I would trade my car with you in \$16.000 in Fresno
 Camping World.

12. The he saw me walking out away, then he said to me that "he will gave my SUV trade
 up to \$20.000,00. That was the same price with Kirby's Barber RV has gave to me. Then I
 stoped to talk with the him with my concerns that he will let me drove the RV back home in that
 day. I do worry about and said to him, " Not, if you give me a RV that has a lot of problems with
 bad quality, after that I have always drive that RV to dealer for fixing the car that I will not do it,
 because I purchased a RV for living and driving , not for fixing it and I am so busy that I have a

1 lot of important things waiting for me to do. I don't have time for driving a car for fixing all the
2 time that there were I said. There are record in shop with that manage was talking with me.

3 13. Then he promised me that he would not gave me a RV with problems..... Also he
4 told me, their RVs do not have problem because someone has drove these RVs to Fresno
5 Camping World from Manufactory in Lincolnshire, IL. If these RVs had problems that the driver
6 wouldn't drive out from the Manufactory to make to Fresno, the dealer can not accept these
7 RVs with problems. When I punched this RV that it has drove about 2870 miles on March 16,
8 2022.

9 14. Then I just believe him what he said in that day. After that, the sales man brought me
10 to his office and he gave me a color advertisements about this RV to let me look it that he went
11 to move two with same model RV to the next door. After that he brought me to walk in the first
12 RVs with under air-condition area was clean on the floor and some where else there was very
13 dusty, also there were two blue hand towels on the floor and next to the clean area that I have
14 took the photos.

15 15. Then we walked in the second RV that was very dusty on the floor with any where.
16 But I was still worry about this RV have problems, I asked the sale man again, are you sure this
17 RV would not have problems ? He told me "yes" that he told me " do not worry about it " with
18 he can guarantee this RV with out problems.

19 16. Also I asked him whether this Rv has solars and I said to him that I would not buy a RV
20 with out solars. He looked the the screen and told me there are solar for this RV. But actually
21 there were not solars on the roof at all.

22 17. Then he let me take the first RV which the floor was clean under air condition that he
23 said the floor more clean. So I truth him and I chosen the first look the RV. Actually the air
24 condition was leaking water in this RV during running. That was why the floor was clean in this
25 RV. So I saw leaking water that was why the area was clean under air condition with two towels
26 were on the floor in the RV.

27 18. During the according was preparing for me for signing the contract with this RV in the
28 Office, then a few people were to clean this RV. The first time, I bought a RV and I never drove
a RV too. so I don't have knowledge about this RV. Also I was a 62 years old single woman
2022 with not good health.

19 19. Because, I knew myself that I wouldn't take more worry and trouble in my life,
20 therefore I bought couple extra insurance for this RV, such like tires warranty, road assistant,
21 etc for this RV for protecting myself. But one insurance that I didn't buy for the \$3999 that I
22 don't know what was about this \$3999 insurance for? I will explaining it below.

23 20. The accounting and sales manage were so push me to sing the contract and leave that
24 campsite. After that I was wonder why the I asked the sales man why don't you let me text
25 driving this RV? He said " I don't need it and I will love to drive this RV" Then he let me drive

1 this RV out of their Campsite and parking it on the street with next to the Campsite because
2 they have to close their business and I could take my time to move out the rest of my stuffs
from my SUV to this RV.

3 21. I said to him that I never drove a big car like this and I afraid to damage other RV in
4 that campsite, because there were so many trailer parking in the Campsite and very crowded.
5 So he was the one who drove this RV out that Campsite and par on the street.

6 22. When I was preparing to leave Camping World after 7 PM during that time there were
7 not too many car on the freeway that I would be safe driving this RV on the road. Then I found
8 the right side mirror that wasn't on the right position. So I can't see the back car when I want to
9 change right line. After that I called the two guys for help that they were closing the gate for
Campsite, They could not move the right mirror too. So I have to leave with right mirror on
wrong position.

10 23. If I want to change the right line that I had to move my body the right, after that I can
11 see the mirror about the back car. So I just drive the right line with low speed under 50 miles,
12 because this was my first time driving a RV and a big car that I have to drive very be careful.
13 When I was on the road that I found the stealing wheel is loose about this RV, I have a little
hard control because there was not truck on the Hwy 33 in that night.

14 24. When I was driving at Hwy 33 on the way to my brother's house in Marina, suddenly a
15 small car drove to front me with low speed . I have to stop this RV that the brake of this Rv
16 didn't work good, so I have changed tis RV to Neutral Gear right way. Therefore this RV has
17 stopped. If not I would hit this small car that I really was so scared with I almost pass out. Then
my body was trembling and I dropped in panic attack right way.

18 25. After that I couldn't just drive and I found a Walmart very close where I was from
19 Google Map. So I had to turned on the Double Flashing Lights on with about slow speed about
20 20 - 25 miles to the Walmart. Then I have completely collapsed down and I thought that have
21 dropped in very bad Depressor and Anxiety. Actually it was that I have smelled exhaust smell
that caused me nausea and dizziness. Then, I found out that I was got a fraud by sales
manage, two sales mans and accounting in the Fresno Camping World.

22 26. That was why that I have stayed in Walmart over night that I didn't check the address
23 of that Walmart. Then I have searching from Google Map and I found out that Walmart address
24 should be at 1575 W Pacheco Blvd. Los Banos. If it happened now that I will call the 911 and
bring this RV back to the Fresno Camping World Dealer.

25 27. I could not sleep all night with my body trembling, until I dropped sleep in in the next
26 in next morning about 5:30 Am. I slept a few house that about 11:15 Am I had to drove with the
27 Double flashing Lights on all the way to Marina. Actually from Walmart to my brother home it is
28 72 miles that took me over 2 hours to drive.

1 28. Then later, this RV come out more problems when I was driving on the Freeway that I
 2 have been gotten extremely damage problems with the brake and stealing wheel. I had to call
 3 the Camping World in Fresno that I tried to talk to the sales manage after I got my brother's
 4 house and I ate something. Then the front desk girl told me that the sales manage did not work
 that day and I left message let him called me back. Then I spoke with the boss in that dealer
 over the phone. That was next day after I bought this RV.

5 29. But I forgot the name of the boss that I told him about I purchased a RV which the
 6 brake doesn't work good and the steal where is too loose too. Then I almost got a car
 7 accident in last night that this RV has drove is very different with with my SUV..... Also
 8 I told him about " I felt that I bought this RV by fraud from your dealer in yesterday". I have to
 fix these two parts for this RV, if not I am driving with great dangerous. He told me that I have
 to go to the Ford dealer for fixing these two parts.

9 30. Therefore I drove this RV to the Cypress Coast Ford Dealer in Seaside which is close
 10 at my brother's home after I hanged up the phone with the Boss in Fresno Dealer. They tole me
 11 that they could not do service for this big RV, because that Ford Dealer does not have a big
 12 machine for the big car. Then technician told me that Salinas Valley Ford Dealer does the
 service for truck and RV.

13 31. When I have drove to Salinas for this RV in next day, but they didn't do the service for
 14 RV any more. I was so crazy that I am so busy and have so much thing to do. So I wanted to
 15 save my time for buying this RV to do my works for my lawsuit. Then I have to pay more money
 16 and waist my more time for fixing it that caused that I can't do my works for my lawsuits. Also
 17 when the first time I drove this RV that I would smell the exhaust gas. But I thought it was
 normal for a truck and RV, because the sells man has drove this RV.

18 32. My depressor and anxiety totally have got extremely worst that have affects my
 19 physical health getting worst that caused to going to Hospitals many times and my blood
 20 prefer super high with out medication control. After that I checked the detail about this RV that
 I found more and more problems with it. I have list the problems with this RV below.

21 33. I believed that the boss should know their RVs problem that he still did not tell me the
 22 truth about why the brake of this RV doesn't work good? He just let me go to the Ford Dealer
 23 for fixing the brake for this RV. So, I was stupid truth him again that I have drove this RV from
 one Ford Dealer to other ford dealer.

24 34. I drove this RV to Gilroy Ford Dealer and they didn't do service for RV again. Then, I
 25 have drove to Johnson RV in Gilroy for fixing this RV that Rv Dealer that superview told me that
 26 I have to wait for 10 Months away for their schedule for RV. So I asked store manage if I want
 27 to trade this RV to a small one. Then the value of this RV was \$58.000,00 that I just bought this
 RV in a few days. I am so stuck in this RV.

28 35. Then two days later, I have called the Ford Dealer in Sunnyvale Ford Dealer that they
 said they do service for RV. When I drove to there that they said I have leave my RV in there for

1 a week. I didn't ready for it. So I drove the truck center Ford Dealer in San Jose that they didn't
2 do RV service any more.

3 36. So I have called the service and boss again in Fresno Dealer for fixing about these
4 problems of this RV. But he told me that they were so busy and all the time have booked that I
5 have to wait over three months late. Then I was so angry and crazy hurt with they did such
6 fraud on me. My blood pressure went to over high right way, my Depression and Anxiety have
7 got extremely worst, my heart.....

8 37. After that I have called to the Bakersfield Camping World, then, they were very good
9 to me that they would take my RV for inspection. So I drove back to Orange County from
10 Marina that I have to stop for fixing this RV in Bakersfield. When they looked my RV that they
11 need more time to do inspection and more work for my RV. So they make an appointment for
12 me to do the inspection. Then make an appointment the Jim Burke Ford Dear in Bakersfield
13 with my brake and stilling wheel.

14 38. When I was on the way to the Bakersfield and some thing fly off from the roof of this
15 RV that I don't know what was that? First over months, Also I didn't what have on the roof of
16 this RV. There is too high that I could not see. Then Dealer didn't show me and told me
17 anything about the roof for this RV. Until the technician told there were not solar on the roof. I
18 just know the defendants told me that was lied. Therefore, I have drove this RV to the
19 Bakersfield Camping World, they can do is very limited that they gave me do an inspection for
20 this RV.

21 39. I always drive this RV on the Freeway with two flash light on at midnight that my
22 speed was only about 45-50 mile/hour, because when the truck and buses passed this RV on
23 the Freeway that I can't control the Stealing Wheel at all. Then this RV automatic go to
24 opposite side the truck and bus that was very great dangerous for me. But I am driving local is
25 ok because I have to drive slow.

26 40. Even now I can't control the stealing wheel of this RV that it still automatic go to the
27 right side left side with my RV, therefore I have to drive with speed under 55 mile/hour. If I drive
28 over 55 mils/hour that I can't control the Stealing Wheel with out the truck and bus passing me,
so it is still dangerous for me to drive over 55 mils on the Freeway. If the right side is lawn that
is Ok, but if there are big cement blocks on the right that really so scared stiff. Then one time I
have got two truck passed me from right and left at same time for two high way are splitting
that time was really scare me I do not want to recall at all. Even though, I have drive this
RV almost two year that I still can't control well for this stealing Wheel and Brake for this RV.

41. The USB recorder and changer never work in passer side. I used to always listening
for the recording of my class in my USB. But I can't get it that let me lost so much. So the
defendants knew this RV has so much problem that they have pushed me so much and don't
gave me time to look this RV.

1 42. A few days later, the air-condition was leaking water from roof, then I just understood
 2 why were there two blue hand towels on the floor in this RV, because there was leaking water in
 3 the Fresno before salt to me. Then I always felt I was so stupid to truth the defendants that I
 4 have gave them business. Then I don't have time for working my lawsuit for other problem for
 5 my brother's house. Then this RV has been waisted so much my money with thousands dollar
 6 for gasoline and lot of my times drive a round for fixing this RV. I was so sick from mental and
 7 physical issue.

8 43. Therefor I have contacted the Head Corp office of Camping World and spoke
 9 superview or manage that he wanted and worked for me to trade this RV to get a car for Class
 10 B from Camping World in Bakersfield He has told the store manage and let me to trade
 11 my RV to buy a small RV. But I couldn't do it, because I lost too much money and I don't
 12 qualify to get other RV from my financial situation. So I didn't get a result.

13 44. Then I drove this RV to San Jose For Couple Ford Dealer that they don't take this big
 14 RV for service have contacted Bakersfield Camping World that they would take my RV for
 15 service. One day when I star this RV that the alarm is sound on in the house that I though It
 16 was leaking profane that smell like it. Then, I have drove to Bakersfield Camping World again
 17 for it that the technician let me go back to Fresno and talk to there.

18 45. Also the sale manage never returned my phone called in Fresno. So, then I have to
 19 drove back to the Fresno Camping World Dealer about 30 days later. When I was driving to
 20 Fresno in that night it was windy and my RV was swinger left and right in animated circle,
 21 drawing arcs with driving 20-25 mil/hour. I have dropped in the panic attachment right way and
 22 I would not continue driving at all that really scared me out of my wits, then I have to stop and
 23 wait to the second morning driving to Fresno Camping World. I have to stop in three times.

24 46. I had a very big argument with the sales manage that he has refused return this RV.
 25 Then he still told me that this RV doesn't have problems and he did the inspection for it when
 26 the dealer got this RV. So, I asked a video from recorder about this RV from he didn't
 27 want to gave to me on march 16, 2022. I told him that he did fraud to sold this RV to me about
 28 I could not drive this RV and he has lied to meabout this RV. Because I did not
 believe this RV with good quality from defendants told to me. So I told him that I have to file
 lawsuit against them. I asked hime what was the \$3999 that they charged from me and he told
 me that he did not know and he let me call the accounting for that. I called him in next day that
 I want to cancel this insurance, then he did want to cancel for me. Why do I need to buy this
 insurance with 3 years about \$3999. The manufactory gave this RV for six years warranty.

47. Also I drove to the three Fresno Ford Dealer that they would not fix my RV. One of the
 dealer from the Fresno Camping World referring that the manage tole me it will work for RV.
 When i drove there and they told me that would not do service with RV.

48. When I went back to Orange County I have call a Ford Dealer in Orange County that I
 forgot the name that they would do only inspection for my RV. They have to charge me for \$800
 with out refund.i do not have money for it. So I drove to the the Puente Hill Ford Dealer in City

1 of Industry. I wanted to fixed and trade this RV. But they could not fix this big RV that the
 2 superview after running this car and he told me that they can not trade this car for me. When
 sales man, Hurry stared this RV and told me this car has problem with wrong sounds.

3 49. I made appointment in North Bay Ford Dealer in Santa Cruz after I have a call and
 4 told the lady about my RV on May 25, 2022. But when I got there that the superview told me
 that they did not want to touch my RV. My Rv's problems with ver complications..... When I
 5 was driving from my brother's house in Marina to Santa Cruz about 35 miles that I have to stop
 6 three times from my dizzy and nausea with body so weak and so sleeping. Even I drove this RV
 that I have to wear a Mask and open the two window that I still can smell the exhaust gas.

7 50. I went to Watsonville Ford Dealer too, but I still can not get fixing about this RV. I have
 8 been drove this RV Dealer from one Dealer to others Dealer. Because I have got hurting so
 9 much. When I just drove from Marina to San Jose that I have stop four to five times if not I
 would make to the Ford Dealers in San Jose. I thanks God protected me with drove this RV
 10 with safe myself and others.

11 51. But I thought my Depressor and Anxiety have been gotten worst and worst these
 12 coasted by my mental and physical health troubles, because I don't knowledge and
 experience. I never heard about it that these feeling coated by the exhaust gas. Then I have
 13 drove back the in Sunnyvale Ford Dealer again that I ready leave my RV in there for a week to
 14 fix it. Then they tole me that they couldn't fix my RV any more because this dealer have to bring
 my RV to the San Jose Truck Dealer for fixing it. Then that dealer wouldn't work for RV any
 15 more. But they did not tell me that in the first time. If I knew that I would not go back to
 16 Sunnyvale Ford Dealer at all.

17 52. I came backMarina from san Jose to, about two days later that electricity total off in
 18 this house part of this RV. So I drove to Camping Word Dealer in San Martin that close to my
 brother's house. I remembered in deep od my memory that day was Thursday. The superview
 19 has check my RV that he tole me he nee more time for check this RV what was wrong with out
 the electricity of this RV. Then he made an appointment for me in next day that was Friday, I
 20 told them I would stay there over night. But I forgot bring my medication with me, therefore I
 21 went to Marina and I couldn't sleep all night after I woke up in the next day. Then I found out
 that I got stroke again, therefore I have to go to the hospital for a few days.

22 53. After I got out hospital in Monterey. I was searching and found the Rush Truck Ford
 23 Center in Wittier in LA county that they would gave the RV service. Then, I had to drive to Rush
 24 Truck Ford Center in Wittier right way. When I got there they found the problem with two mins.
 The exhaust has a big hole that the electricity wire burned it because the manufacture did
 25 wrong job. So the back house didn't have electricity power at all.

26 54. So I have contacted the manage of manufactory, Thor Motor Coach right way for
 27 approve me for fixing this RV in Rush Truck Ford Center. Then he doesn't allow fixing this car in
 28 there that he sent to me other a few RV Dealers. I really want to go the Bakersfield Caping

1 World that I couldn't make it. It was too far and this RV couldn't see any thing when I reversed
2 this big RV because this house does not have battery.

3 55. So I have drove this RV to the closed me one which it is Mike Thompson's RV Dealer
4 that is from email of manufactory. The technical man, Jame Basham has gave me big talking
5 how powerful he would do my RV..... Then this RV was in the RV Dealer for three month that
6 the electricity with battery still did not connected good with Generator. Actually the RV
7 Dealership didn't do good job for my RV at all with wrong charging from me. On July 20, 2022,
8 I dropped my RV into Mike Thompson's RV. When I took a train OC to Marina that I have time
9 to checked online review about RV Dealer. After that I had a little regret and worry about my RV
10 that same thing happened to me in the review said too.

11 56. After that I have email to the manage of manufactory again that he didn't respond my
12 email. Until now the, the air condition does not work, not fixing it and Generator doesn't work,
13 many problems, etc with this RV. So during summer, there is not air-condition in this RV and
14 during winter there is not heater in this RV that was why I got sick with fever for Cold.

15 57. I planed to sue this RV Dealership in Federal Court too, but when I chuck the Federal
16 Court Requirement that I didn't see this RV Dealer is not meet the requirements. Because this
17 RV Dealer is not eligible with claim money under 75.000 and it is located in LA County. I think it
18 is not qualify for Federal Court. So I have to sue this dealer in LA county superior County. If the
19 judge allow me to file Mike Thompson's RV to the Federal Court that I will added.

20 V. Causes of Actions

21 First Causes of Action

22 Fraud & Deception as against defendants; Camping World Company and Thor Motor Coach.

23 1. The sales manage knew that this kind RV is difficult to drive. This was why they do not allow
24 me to drive this RV even I asked. Because he knew if they allow me drove this RV on the Freeway that I
25 would not buy this it at all. So they have to lie to me. When I went to Fresno Camping World after I
26 purchased this RV. He just told me I have to learn how to drive this RV.

27 2. I was yelling about him why did he lie to me in the beginning from my health problem that can
28 not drive this RV, but I don't know other RV drive like. Maybe other RV will be different.

29 Second Causes of Action:

30 Misrepresentation as against defendants; Camping World Company and Thor Motor Coach.

31 The FCW and Manufactory, Thor Motor Coach did not tell me the truth about this RV that
32 they did not have any hand write to tell about this RV has problems to drive..... So I bought this RV
33 that it is very serious with dangerous and unsafe for me and others . Then sells manage has
34 lied to me that car does not have problem. But I have found the problems with this RV below.

1 1. I found out this RV is an unsafe to drive in the same day on March 16, 2023 that I
 2 purchases day. Because the break doesn't work good and steering wheel are out good control
 3 when I driving this this RV going to my brothers home. This RV is not drive like my SUV at all
 4 that like the sales manager told me in FCW. Special when I drive it on the Hwy that it isn't only
 dangerous for my self and dangerous for others too. So I would not buy this RV at all if I knew.

5 2. I found this RV drives like draw circle during windy day that I can not handle steering
 6 wheel also that I drive on the Hwy more unsafe and dangerous for my self and others. So I
 would not drive this RV in windy day at all.

7 3. I found out this RV didn't have solars that like the sale man told me. Because I knew this
 8 RV has so much trouble with the battery charging that It is not convenient at all. Then I would
 9 not buy it at all.

10 4. I found out there are not sense on the top of front and reverse this RV that these are lights
 that I will not buy it. If I knew that I would not buy it.

11 5. I found out this RV can't see the back car from the central mirror, because I have used to
 12 drove a car with central mirror that I can see my back car in 28 years, then special this RV is over
 13 high and over wild. I still can not use to it even I have headache when I think about it. Then I
 would not purchase this Rv also if I knew.

14 6. I found out the USB recorder never working since I purchased this RV and USB charge
 15 don't work on Passenger side also. Before I always listen my class recorder when I was driving
 16 for refresh my memory. But I can't have it after I purchased this RV. So I have been losing so
 17 much knowledge that special for me with I have reading disability. Therefore I purchased that I
 have been lost so much.

18 7. When I drove to this RV to the RV Dealer for fixing and the technicians just look out side
 19 of my RV and they told me and pointed me that this RV losing the sealant from sides roof that I
 20 have to fixing it. if not this RV would have much more damage from leaking water in the house
 21 wall. Then I went to Home Deport and bought a very big Ladder with the waterproof glue.
 22 When I got on Roof that much worst than I thought. Two side of the corner that is the roof and
 walls did not even have caulking. Then I have to do with caulking and working in detail for a
 few days. Therefor this RV is so bas quality.

23 8. If I knew this refrigerator with gasoline and electricity that I would not buy this RV. I only
 24 use propane for refrigerator that I have to paid \$45-50/month. I never us the stove and oven,
 25 shower and Tv, etc that I did not know these work to not. I never use these . I have use a stove
 that I purchased before I bought this RV and I always take my shower in 24 house fitness.

26 9. Also the floor bulging up during summer and the wall peeling off when I have stick a
 27 small hook on the wall for handing a small brush. Because the manufactory has used the very
 28 bad quality glue. Other such like door, cabinet and draw etc This RV just is bad
 quality.

1 10. The roof leaking water that I did n't know who damaged. When I drive to the Seaside
2 dealer in next that I purchases this RV. The technician let me drive to the car service area in
3 Ford Dealer in Seaside. The top of RV stuck the ceiling. I believed this RV has Leaked water in
4 the FCW. When they gave me this RV the roof already has damaged. I let technician in take the
air condition off from roof in Bakersfield Camping World and put it in the storage of this RV.
So this RV did not have air-condition.

5 11. I believe that the defendants will definitely deny what did my complain the truth. But
6 this Fresno Camping World Dealer has had the video recorders any where in there that can
7 show the defendants have lied to me and what I said is true in my complain about in this
lawsuit.
8 Therefore the Camping World and Thor Motor Coach Corp have sold an unsafe RV to me by
fraud that they treated people's life invaluable, in damage with suffering.....

9 10 Third Causes of Action

11 Breach of Fiduciary duty as against defendants; Camping World Company and Thor Motor Coach.

12 1. Does not matter how many factories made a car that should be safe with out problems. The FCW
13 has to prepare a RV with out problem and driving safe a car for me that was the first that is the dealer
responsibilities and obligations. If not, this RV can to put on the market for sals, because it is related to
14 someone's life. But they did not.

15 2. Also when any RV went out the manufacture, Thor Motor Coach that RVs have to with good
16 quality with running safe on the road that was the Breach of Fiduciary duty for the manufacture, if This
RV has problems the Thor Motor Coach has to fix well with safe on the road first . Then the RV will past
17 to the Dealer for sale. Because someone the life in this car. But, the Thor Motor Coach, manufactory did
not.

18 19 Forth Causes of Action

20 Breach of Contract as against defendants; Camping World Company.

21 1. I purchase a new RV with not problems that I didn't buy a used RV with a lot of problems and
22 unsafe driving a RV from the Fresno Camping World RV Dealer. But they gave me a bad quality RV with
dangerous driving a RV to me that these were out of our contract.

23 2. Also the defendants of FCW weren't allow me driving on the road text this big RV that was not
24 legal processing for me to buy this big car. Then they have lied tome that it was like I drove my USV.
25 Because they knew if they let me drive this RV before I purchased that I would not buy this RV. Then they
would not be successful by fraud on me that RV was very difficult to drive that is not like drive regular
26 with my SUV at all. So I would not signed this contract for purchased this RV at all also.

27 28 Fifth Causes of Action

1 Products Liability as against defendants; Camping World Company and Thor Motor Coach.

2 1. Because the quality of this RV can not be out of manufacturing for selling. Because this RV
3 has serious issues with so much problems that damages to me drive on the Highway and
4 others. So I have purchased a new RV that should get one with out problems for save to drove
5 on the road by Laws.

6 2. The I knew there is a quality Department in the Thor Motor Coach that have to check the
7 quality one step by one step for the RV quality when they made for this RV. I knew that very well because
8 my father was a top technician engineer in the super big air compressor factory in China when I was a
9 child that he always take to his office and he always talks about quality stuff when he was home. He let
10 me take my major with Machine Design, that was why I have took a social degree with three year. So I
11 have did my internship was in my father's factory with one year. I do not why would this quality a RV be
12 out manufactory for sell? I have been driving over 30 years and I don't have experience like this car at all.

10 Sixth Causes of Action

11 Elder Abuse as against defendants; Camping World Company and Thor Motor Coach.

12 My mentally has got serious damaged and I have been hate myself that I was so stupid to
13 buy this RV and I hate these people have fraud me for this RV from FCE also. I have even
14 thought to kill myself for I have got this fraud.

15 1. When I bought this RV that I was 62 years old in March 16, 2022. The defenders have knew about
16 my English not good with out knowledge for RV and laws also. So they would lie to me and gave such
17 bad a RV to me.

18 so they were so bold to do this fraud on me and gave a so bas quality RV in Fresno Camping World.
19 Therefore they could have so bold doing such this fraud and damaged on me for taking more money for
20 me.

21 2. Therefore, I have been taking so much mental suffering since I purchased this RV on March 16,
22 2022. Also it affect to my physical health problem with so much painning my body that I hav got worst that
23 can do very limited

24 3. The defendant gave me an unsafe with such damaging and bad quality about a RV
25 frightening is they gave me, so the defendants have been bringing me in extremely pressure in
26 my life from I gave them business. I still can not adept it when I though now. that has caused my
27 insomnia got more worst and I can not work and write my complain with lawsuit too much. So I have to
28 study laws for my lawsuit my mind has been troubled me so much that caused me my thinking and doing
very slow, etc. So I was always so regard purchasing this RV

4. Even now, when I think about I have almost got a car accident on March 16, 2022 or
other time on the Hwy with driving this RV that my body is still trembling. I have been take so
much pain from purchasing this RV. Since past three weeks when I have to recombine what
was happening about this RV. I have been writing this complaining since Jan, 2023. But I

1 wrote little by little because my pain of my heart, my body trembling and even palpitation of my
2 heart, etc. that caused me to stop for time and time. So it have been took me so long to write
3 this complain.

4 5. I wish I can found an attorney for help me this Lawsuit., but I don't have money to pay attorney.
5 Because I am on disability now with SSI pay in last year \$1136/mo, then this year it is \$1186/mo. I have
6 to pay my store and the gasoline for this RV a few hundreds /mo for this RV. So I haven't been paying
7 my RV payments for \$15 months. For this lawsuit that I have been spend a lot time because I don't have
8 law educations and my English is not good, I have reading disability. Also I have mental with physical
9 health problems. So it is very difficult for me writ this complain.

10 6. My Arthritis has been getting so worst with my fingers, my knee and hips. etc since Dec, 2023 that
11 it is almost 4 mothers. When I went to see my Arthritis Doctor that she told me the depression and
12 Anxiety would caused my Arthritis is getting worst. It is hurting me so much that I could ant walk and
13 stand up. I almost was on the bed and my finger can not type to.

14 7. I could not sleep good, eat good and rest good also, because I a living on RV with I am parking
15 on the street that I have change the different location in every day for hiding that affected my health
16 damaged so much too.

17 8. But during one year after I got a fraud from this RV that I only knew crying and hitting myself
18 body and face that my mind was empty. I only drove to the Dealers one by other one for fixing this RV.
19 All these dealer wanted to charger me for doing inspection for this RV.

20 9. Until now I still could not drive this RV on Freeway during day time because the brake still
21 didn't good with over 55 mile. If I drive over 55 miles that it is unstable with floating at left and right.....
22 A few times this RV have to have time to stop that I have to use nature gear to stop this RV that really
23 scared me so bad. My blood pressure went to super high in right way.

24 10. I could not believe the defendants in Camping world gave me such a big and many
25 problems RV that they are troubles for my life so much. Also it was an unsafe car for me to
26 drive, but it was not only unsafe to me that it was unsafe for others people too when I am
27 driving. Therefore my life and other person's life on this RV too and the they did not even care
28 about my life and someone's life for making more money. Then I have been collapsed down
29 with hurt myself. Then much more cost things I did not found yet.

Seven Causes of Action

Intentional Infliction of Emotion Distress as against defendants; Camping World Company and Thor
Motor Coach.

1. I did not know that I bought a this RV that I have to take much suffering and cause almost lost my
life. If I knew that I would not buy this RV. I bought this RV that caused me so sick from mental and
physical, even I wanted kill myself. I have been take too much stuffing in past two years.

1 2. I went to my brother's home in Marina after I dropped off my RV to the Mike Thompson's RV
2 Dealer. When I got there that I saw a letter from Chicago Title Company that they would do Public
3 Auction on Nov 01, 2022 for my brother's house in Marina. Since I purchased this RV that I don't have
4 time to do anything for the lawsuit for the house in Marina. I got terrible fraud for bought that house and
I signed the closing documents for his house.

5 3. Therefore I completely collapsed and dropped sick with mental and physical in so deeply. So I
6 have called ambulance for hospital time and time that these anger and pain caused me wanted to kill these
7 people and myself. If I did not buy this RV and this RV does not have such problem that I must have time
8 to working my lawsuit. I wouldn't get eviction out Marina's house and I have lost millions. That was why
I filed this Lawsuit delay because I have to work the lawsuit for the House of Marina.

9 4. I have been wrote this complain over one year from little. But I could not read and recombine for
10 this final complain in this past three weeks, because I have been got super pain and hurt these caused me
11 dropping into so sick with depression and anxiety with I could not sleep all night long, my chest pains
12 much and headache so much..... with very high blood pressure and palpitations. I don't want to recall
13 for past, but I have to face it. Then I began hurt my self again and I wanted to kill myself again. I would
not finished write my complain for I wish. so I will amend this complain late. Because I do not want to
file this lawsuit late.

14 5. Even now I am still suffering with this RV, because I still have to drive this RV with under 55
15 mile/hour on the Hwy in mid night. Because I do not get car accident that I do not hit someone with this
16 brake out of control. I have been almost got a car accident with this brake of RV with low speed in a few
17 times. So I have to drive during on day time at local, to take buses to go some where. Only night time I
18 will drive on the FreeWay. I will dispose this RV as soon as possible when I have money. Because I still
can not handle good stealing wheel and control well with brake of this RV. I could not make payments of
this RV for 15 months on March 15, 2023. I am living with very nervous with hiding.

19 6. I got stroke on Friday that was on July 07, 2023 that I have remembered very clear that was
20 Friday, after I found out this RV didn't have electricity that meaning there wasn't Electricity or Battery in
21 this RV with house part on July 05, 2023. So the reverse camera was not working. During that time, I was
22 in Marina of Monterey County. In next day that was on Thursday, I have drove this RV to the San Martin
23 Camping World which closed to Marina for checking and fixing it. That day they were busy they need
24 more time to do inspection, so the superview gave me an appointment in next day that it was Friday, I
25 have supported to stay there over night to wait for my appointment in next day. But my blood pressure
was over high and I did not feel good that day. Then, I didn't bring medications with me, therefore I have
to go back to my brother's home that night that I could not sleep all night. When I waked up in Friday and
I found about I got stroke again. So I went to the Monterey Hospital for three days.

26 7. I really hate myself that I was stupid truth defendants to buy this RV with hurting myself.
27 Therefore I have to see psychiatrist with ate medications. Then I am living my life with fear and tension
28 with worry so much about Ally will take this RV from me, then I will not have any where to live,.... etc.
These caused and impact my Physical Health Damaged so much. I am stuffing in every day. I have to get
rid of this RV as soon as passible.

1 8. I have very bad hypertension with history stroke, if I got nervous and my blood pressure would
 2 go very high that the medication is out of control it. Also I have anxiety with depression, very bad
 3 insomnia, etc. That way why I want to buy a RV for my good rest good for my health and also I can save
 4 my time doing more work and study..... Then I won't lost a lot more. But I got the opposite result by
 5 fraud from the defendants in Fresno Caping World, then my mental and physical health have got more
 6 injury and I have waist more time and lost more. That just for I purchased this RV.

7 9. I have been working this lawsuit very, very difficult by myself because my mental and physical
 8 health both trouble me so much, I have extremely headache and dizzy with my insomnia got so worst
 9 again with all night, so my mind did not clear in the past 10 days. Also my actions are inconvenient with
 10 hips pain with injury. That was why I can't finish to write my complain because Palpitations all the time
 11 with my chest pain so much, very hard to concentrate, etc.

12 Eight Causes of Action

13 Trespass to Chattel as against defendants; Camping World Company and Thor Motor Coach.

14 1. I got a fraud to pay \$3999 for the insurance with inside materials of this RV by the accounting
 15 from Fresno Caping World. When I found a fraud about that I purchased this RV and I began to look it the
 16 contract and I found out it. I have contact for cancel and he didn't want to cancel for me.

17 2. This RV has such bad quality with seriously problems that I think from these issues this RV
 18 should not be out of the manufactory for selling. Also I felt it is not even worth the price that I have paid
 19 for it to Fresno Caping World.

20 Nine Causes of Action

21 Financial damage as against defendants; Camping World Company and Thor Motor Coach.

22 1. I got broken from I purchased this RV that caused me with 15 months that I can not make my
 23 payments for this RV on the March 15, 2024. Also I have been hiding to live since March 23, 2023
 24 because I got eviction out of my brother's house in Marina, after the I am became a homeless. I am very
 25 very thanks and appreciate for the loan company, Ally could tolerated me, if not I have to live on the
 26 street. Therefore I will pay back this RV payments with penalty as soon as passible.

27 2. The Medical has been paid on me a lot of money that in past two year and will pay my future
 28 Too. I'm so sick from my mental and physical that caused by both defendants did such wrong to me. So
 the both defendant have to pay my Medi-Cal from my hospital visit, ambulance bills, doctors visits, my
 medications, transmutations to visit doctors and others medical bills, etc.for the past two years, now and
 futures too.

1 3. I have lost millions for my brother house with financial in the past two years and my credit got
2 damaged. Let me lost so much time for this RV too. Even one's time is money and so do I. So I have
3 claim money from my time in the past, now and future. I could not do my business in past two year or
future one or two years more.

4 4. I have to spend time for looking attorneys and talking with an attorney. Then I have to spend a lot
5 of time for working this lawsuit and star law too. Also the time can't be bought back with money. Then
6 the time is money also. I paid my time on this matter and I do not have time to do others.
Financial damage as against defendants; Camping World Company and Thor Motor Coach.

7 5. I star my business by my professional with Chinese Health Nutrition Products in Jan, 2022 because
8 this RV problem that I can't work it. So I have over \$230,000.00 student loan that I did not pay back
9 from my Master and PHD with Chinese Medications. So, I have been stuck in the RV that I do not have
time my doing my business that caused I have lost money from this too.

10 6. I have to drive this RV to RV Dealer and Ford Dealer for fixing of this RV that caused me to pay
thousands dollars for gasoline and my time and RV mileage, etc.

11 7. I have paid by my self for fixing with a piece of metal that it fall off from under this RV at mid
12 night on the Hwy 5. Then I have to wait to the morning to hole it to drive to Bakersfield Camping World
13 Dealer that they did not take the manufactory Warranty, if not I can't drive this RV that really waist my
time for all day long.

14 8. Also I do not have money to pay the car registration for over three thousand dollars for 2023 and
15 2024.

16 17 Then Cause Of Action

18 Negligence as against defendants; Camping World Company and Thor Motor Coach.

19 I have to add later for this part

20 21 Notice

22 I am so sick and I really can not take it any more, So I have to go to hospital after I drop off my this
23 lawsuit in the Court because I could not wait any more. I should go to the hospital in a few days ago, but I
24 was worry about the doctor will keep me in the hospital in days that I will file my lawsuit late. Then I
25 have to amend later I just check my blood pressure it is high blood pressure is 204/122. But the dead line
26 is today for filing my lawsuit, Then, I don't want to get more problem with filing this lawsuit. So I will
27 file my complain in tomorrow this one that I did not finish. Then I will amend with add more from my
miss part later.

VI. Request For Relief

Wherefore, the plaintiff, Angel Wang requests through this Court:

1. I ask the defendants Fresno Camping World compensation list below

a. I ask the defendants, Fresno Camping World to pay my filling fee with any thing cause for this lawsuit in Federal Court.

b. I ask the defendants, Fresno Camping World to pay back the Medi-Cal that they has paid for me for hospital visit, doctors visits, my medications, the cost of transmutations to visit doctors, ambulance bills and others etc. in the past two years, now and futures.

c. I ask the defendants, Fresno Camping World compensation to me. \$1000. 000,00 with Elder & Mental abuse, Physical Suffering, but my life to shorten and damaged woman beauty that caused me that I don't want to look the mirror to see myself.

d. I asked the defendant Fresno Camping World compensation \$450. 000,00 with Financial Damage, Losing Money with mu business & Trespass to Chattel.

e. I asked compensation increase by monthly with health damaged, financial damaged and abuse.

2. I asked the defendant, Thor Motor Coach compensation below

a. I asked the defendant, Thor Motor Coach to pay the filling fee with any thing cause for the this lawsuit in Federal Court.

b. I ask the defendant, Thor Motor Coach to pay back the Medi-Cal that they has paid for me for hospital visit, doctors visits, my medications, the cost of transmutations to visit doctors, ambulance bills and others etc. in the past two years, now and future.

c. I asked compensation \$700. 000,00 with Elder & Mental abuse, Physical Suffering, but my life to shorten and damaged woman beauty that caused me that I don't want to look the mirror to see myself.

d. I asked compensation \$150. 000,00 with Financial Damage, Losing Money & Trespass to Chattel.

e. I asked compensation increase by monthly with health damaged, financial damaged and abuse.

VII. Demand For Jury Trial

Plaintiff, Angel Wang hereby requests a jury trail on all issues raised in this complaint.

Dated: March 15, 2024

Sign: Angel Wang

In Pro Per: Angel Wang